

UNITED STATES BANKRUPTCY COURT

Southern District of Georgia

In the matter of:

CHARLES TERRANCE JILES

)

Chapter: 13

)

Case No.: 17-41086-MJK

Debtor(s)

)

CHARLES TERRANCE JILES

)

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)

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Movant

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RUSHMORE LOAN MANAGEMENT SERVICES, LLC

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Respondent

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)

NOTICE OF OBJECTION TO CLAIM

Movant has objected to your claim filed in this bankruptcy case.

Your claim may be reduced, modified or eliminated. You should read these papers carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult one.

If you have legal grounds to oppose the objection, or if you wish the court to consider your views on the objection, you must file a written request for a hearing with Clerk of the Bankruptcy Court before the expiration of thirty (30) days from the date stated in the certificate of service.

If you mail your request for hearing to the court, you must mail it early enough so that it will be received within the time referenced above.

Any request for a hearing must also be mailed to the moving party and all other persons indicated in the certificate of service attached to these pleadings.

If a timely request for hearing is filed, you will receive a notice of the date, time and place of hearing.

If you or your attorney do not take these steps, the court will decide that you do not oppose the objection to your claim.

Claimant has been served with a copy of the objection and a copy of this notice, and if claimant is a U. S. government agency, the U.S. Attorney, P.O. Box 8970, Savannah, GA 31412 (or P.O. Box 2017, Augusta, GA 30903), and the Attorney General in Washington, D. C. 20530 have also been served.

Date November 16, 2022

/s/ Daniel C. Jenkins Bar No. 142345

Attorney

Lucinda Rauback, Clerk
United States Bankruptcy Court
Southern District of Georgia

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

IN RE: §
§ Chapter 13
CHARLES TERRANCE JILES, §
§ Case No. 17-41086-EJC
Debtor. §

AMENDED OBJECTION TO CLAIM # 3 OF
RUSHMORE LOAN MANAGEMENT SERVICES, LLC

NOW COME the above Debtor(s) and show this Honorable Court the following:

1.

Debtor(s) filed a Chapter 13 petition in the United States Bankruptcy Court for the Southern District of Georgia on July 26, 2017.

2.

A claim (claim #3) was filed by the RUSHMORE LOAN MANAGEMENT SERVICES, LLC in the total amount of \$ 154,111.06 inclusive of a pre-petition arrearage claim of \$22,957.66.

3.

Debtor(s) have submitted a mortgage modification request which has been deemed complete and is currently pending final approval. Upon final approval, the balance of the mortgage arrearage claim will no longer be a claim necessary to be funded by the Chapter 13 Trustee.

4.

Debtor objects to further funding of Claim #3 and that the claim be disallowed as resolved by mutual and contractual modification of the subject debt.

WHEREFORE, Debtors request that the claim (claim #3) of the RUSHMORE LOAN MANAGEMENT SERVICES, LLC be reduced to the amounts paid; disallowed for any further disbursements, and further relief this honorable court deems just and appropriate.

This day, November 16, 2022.

/s/ Daniel C. Jenkins
Daniel C. Jenkins
Georgia Bar No. 142345
Attorney for Debtor(s)

LAW OFFICES OF DANIEL C. JENKINS, LLC
24 Drayton St., Ste. 204
Savannah, GA 31401
912.480.9999
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

IN RE: §
CHARLES TERRANCE JILES, § Chapter 13
Debtor. § § Case No. 17-41086-EJC

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the "AMENDED *OBJECTION TO CLAIM #3 OF RUSHMORE LOAN MANAGEMENT SERVICES, LLC*" and "NOTICE OF *OBJECTION TO CLAIM*" along with the property order filed in the above-styled matter to be served via Notice of Electronic Filing to those parties listed below who are registered participants of the Electronic Case Filing System.

O. Byron Meredith, III, Chapter 13 Trustee
Stephen Ryan Starks GASD.bankruptcy@phelanhallinan.com

I hereby certify that on November 16, 2022, I caused the above-referenced pleadings to be served by depositing same in the United States Mail, with adequate first-class postage affixed, addressed to those parties listed below who are not registered participants of the Electronic Case Filing System:

Rushmore Loan Management Services,
LLC PO Box 52708
Irvine, CA 92619-2708

Attn: Authorized Agent or Officer
Rushmore Loan Management Services,
LLC PO Box 52708
Irvine, CA 92619

Executed on: November 16, 2022

By: /s/ Daniel C. Jenkins
Daniel C. Jenkins, Bar No. 142345
Attorney for the Debtor(s)

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